

# **EXHIBIT C**

**Bellator Sport Worldwide LLC's  
Objection Letter dated June 14, 2019**



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June 14, 2019

**VIA ELECTRONIC MAIL ONLY**

Hon. Richard F. Boulware II  
United States District Court  
District of Nevada  
333 Las Vegas Blvd South  
Las Vegas, NV 89101

Joseph Saveri Law Firm, Inc.  
601 California Street, Suite 1000  
San Francisco, CA 94108

Boies Schiller Flexner LLP  
1401 New York Ave, NW  
Washington, DC 20005

Re: Non-Party Bellator Sport Worldwide LLC's Objection to Potential Use of Confidential Information at Evidentiary Hearing in *Le v. Zuffa, et al.*, Case No. 15-cv-01045-RFB-PAL

To the Honorable Richard Boulware II and Counsel of Record:

In response to the letter dated May 28, 2019, from counsel for the parties in the above-referenced action regarding the potential use in connection with the upcoming evidentiary hearing of certain documents and information of Bellator Sport Worldwide LLC ("Bellator") that have been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY," Bellator hereby objects to the disclosure of the following documents and information to the public and/or to the parties as follows:

- **Bellator document labeled SBPCL00002101-2102.** Bellator designated this document as "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" and objects to the disclosure or dissemination of the document, or any information it contains, in whole or in part (including as summarized in the parties' expert reports), to anyone other than as permitted in the Stipulated Protective Order. Bellator continues to insist that this document, and the information it contains, be treated as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" as the document contains years of Bellator's detailed financial information and constitutes some of the most sensitive financial and business information in existence regarding Bellator. Public disclosure, or disclosure to the parties, could have a significant negative impact on Bellator's ongoing and future business strategy and performance.

Kendall Brill & Kelly LLP

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- **Scott Coker Deposition Transcript Pages 95:10-20 and 117:11-18.** The parties have identified certain excerpts from the deposition of Scott Coker, Bellator's CEO, that they may offer in connection with the evidentiary hearing. Bellator objects to the public disclosure of just two of the excerpts: Page 95, Lines 10-20 and Page 117, Lines 11-18. Bellator continues to insist that these two excerpts be treated as "CONFIDENTIAL." Further, Bellator objects to the public disclosure of any excerpts of the Scott Coker deposition that have not been identified by the parties in connection with the May 28 letter and the related meet and confer process, for which Bellator has not had the opportunity to review and consider an objection to disclosure. Bellator does not object to the public disclosure of paragraphs 15 and 20 of the Declaration of Scott Coker, which was submitted in connection with Bellator's motion to quash in this matter.

The parties also identified additional documents produced by Bellator that they may offer in connection with the evidentiary hearing, as set forth on the attachment to the May 28 letter. During the meet and confer process, Bellator proposed certain redactions to those documents to address its confidentiality concerns. The parties have indicated that the proposed redactions are acceptable, and on that basis – and subject to the redactions – Bellator does not object to the public disclosure of the documents with the following bates labels: SBPCL00000324; SBPCL00002713; SBPCL00003784; and SBPCL00002311.

Bellator hereby requests an opportunity to participate in any proceedings regarding the foregoing objections so that it can protect its confidential and proprietary business and financial information.

All of Bellator's rights are expressly reserved.

Sincerely,

A handwritten signature in blue ink that reads "Philip M. Kelly". The signature is written in a cursive, flowing style.

Philip M. Kelly